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July 8, 2013

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-A325
Washington, DC 20554

*Via ECFS*

***Re:*** **GN Docket No. 13–5, Technology Transitions Policy Task Force**

Dear Ms. Dortch:

In the document, *Technology Transitions Policy Task Force Seeks Comment on Potential Trials,*[1] the Technology Transitions Policy Task Force asks:

> *Should there be a trial database that provides access to number-related information such as points of termination or Caller-ID information? If so, how would we ensure that the information in the trial database(s) is kept consistent with existing databases such as…the caller-ID name (CNAM) databases?*[2]

Evans Griffiths & Hart, Inc. (EGH) believes the key to maintaining consistency of comparable databases in the PSTN and IP domains is the use of a common *administrative database system* to concurrently provision PSTN and IP telephone number ("TN") databases. In this model, the administrative database system holds the definitive TN data records maintained by the service provider, and concurrently updates both the PSTN database and its IP counterpart. The administrative system is responsible for update controls and database audits that ensure the PSTN and IP databases remain "in sync."

This approach is already used today in the PSTN, where major wireline service providers use multi-purpose administrative systems to provision multiple PSTN databases, including LIDB, non-LIDB CNAM databases, intercept systems, calling card issuance systems, and others. This concept is easily extended to administer TN-related data in IP telecom databases as well.

In this approach, the administrative system (which we term a "Unified Subscriber Data Administration System") receives inputs from a multiplicity of sources, including carrier wireline and IP ordering systems, manual work, and transaction feeds from other service providers who are "wholesale customers" of the carrier's LIDB/CNAM *(etc.)* services. The Unified Subscriber Data Administration System maintains a single master TN record containing all relevant data

[1] DA 13-1016, *Technology Transitions Policy Task Force Seeks Comment on Potential Trials,* May 10, 2013
[2] *id.,* II. Additional Trials, "*Numbering and related databases,"* pp. 10–11.

elements associated with that TN. Selected data elements are provisioned, as appropriate, to the "downstream" databases, such as the PSTN's LIDB and non-LIDB CNAM databases, as well as IP-based CNAM and other IP telecom databases. The Unified Subscriber Data Administration System maintains access controls and other security measures to ensure only the carrier of record has the ability to update a given TN's data record.

The **TELSA**™ (**Tel**ecommunications **S**ervices **A**dministrator) software system from EGH performs this function today, administering multiple PSTN databases for a number of major LIDB operators. EGH has successfully demonstrated **TELSA's** concurrent administration of LIDB and IP-based databases.

Also in regard to databases, and as we noted in our previous comments,[3] EGH believes the transition to all-IP telephony offers a unique and timely opportunity to bring greater accuracy and consistency to the CNAM information delivered to called parties. The industry may find that there is a need for *authoritative* caller name, potentially delivered from universally available CNAM databases. We believe this subject also merits exploration as the Technology Transitions Policy Task Force designs its "real-world trials."

Respectfully submitted,

*/signed/*

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[3] *Comments on PSTN Databases and the Transition to IP Telephony,* Evans Griffiths & Hart, Inc., October 10, 2012, http://apps.fcc.gov/ecfs/document/view?id=7022032292, p. 9: "Conclusions and Recommendations"; and *Subscriber Data Elements and Transition to IP Telephony*, Evans Griffiths & Hart, Inc., February 5, 2013, http://apps.fcc.gov/ecfs/document/view?id=7022117659.